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33 **UNITED STATES DISTRICT COURT**
34 **CENTRAL DISTRICT OF CALIFORNIA**

35 MOOG INC.,

36 Plaintiff,

37 v

38 SKYRYSE, INC., ROBERT ALIN
39 PILKINGTON, MISOOK KIM, and
40 DOES NOS. 1-50,

41 Defendants.

42 SKYRYSE, INC.,

43 Counterclaimant,

44 v

45 MOOG INC.,

46 Counterclaim-Defendant.

47 CASE NO. 2:22-cv-09094-GW-MAR

48 **STIPULATION AND JOINT**
49 **REQUEST TO MODIFY**
50 **PROTECTIVE ORDER**

51 Complaint Filed: March 7, 2022
52 Counterclaims Filed: January 30, 2023

53 Judge: Hon. Margo A. Rocconi
54 Crtrm: 790, 7th Floor

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STIPULATION

IT IS HEREBY STIPULATED by and between Plaintiff and Counterclaim-Defendant Moog Inc. (“Moog”), Defendant and Counterclaimant Skyryse, Inc. (“Skyryse”), Defendant Robert Alin Pilkington (“Pilkington”), and Defendant Misook Kim (“Kim”) (Kim and Pilkington are collectively referred to as the “Individual Defendants”) (collectively, the “Parties”) through their respective attorneys of record, as follows:

WHEREAS, Jeri Rouse Looney is no longer employed by Skyrse.

WHEREAS, Blake Bilstad is the current General Counsel of Skyrse.

10 WHEREAS, the Parties stipulate and agree to amend Paragraph 1.5 of the
11 Protective Order (Dkt. 89) to remove the reference to Ms. Looney and replace it with
12 a reference to Mr. Bilstad, so the amended paragraph will read as follows:

13 “1.5 Designated In-House Counsel means In-House Counsel who seek
14 access to “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY”
15 information in this action. Unless otherwise agreed to by the Parties, Designated In-
16 House Counsel means Jeffrey T. Williams, counsel for Moog Inc. and Blake Bilstad,
17 counsel for Skyrse, Inc.”

18 NOW, THEREFORE, the Parties stipulate and agree, subject to the Court's
19 approval, to so modify the Protective Order.

IT IS SO STIPULATED.

Dated: May 10, 2023

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ATTESTATION

Pursuant to Civil Local Rule 5-4.3.4, I, Gabriel S. Gross, attest that concurrence in the filing of this document has been obtained by all signatories.

Dated: May 10, 2023

/s/ Gabriel S. Gross